

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 06/15/1999 8:35 a.m.

Site Contact(s): Ted Hopkins **Phone:** 966-7652

Regulatory Contact: Chris Gilbreath, CDPHE **Phone:** 692-3315
Dave Kruchek, CDPHE

Agency: CDPHE

Purpose of Contact: Scoping Meeting regarding B865/883 proposed structures for deactivation.

Discussion: Gary Konwinski has identified a number of structures that he is seeking guidance from CDPHE on to determine whether or not these structures fall within the definition/scope of the Type 1 Facilities identified in the DPP. Gary is proposing removing the following ancillary structures/free standing equipment under deactivation and in the spirit of RFCA consultative process is seeking approval of CDPHE to remove the following:

- Makeshift carpenters shop;
- Four cargo containers;
- Sutton Extrusion Press switch-gear house, Building 863;
- Sutton Extrusion Press fire suppression system;
- Cargo containers storing records;
- CO2 cleaning equipment.

Gary has completed a Reconnaissance Level Characterization and Final Survey Report (following the DPP) for these structures. This document was used as the agenda for the tour of the structures. This tour was conducted on June 15th at 8:30 a.m. and was intended to familiarize the State with the ancillary structures/free standing equipment. Present for this tour were Chris Gilbreath, CDPHE; Dave Kruchek, CDPHE; Ron Carlson, K-H; Randy Leitner, K-H/PE, and Ted Hopkins, RMRS.

After the tour, a brief meeting was held in T124A to discuss this issue. The following areas were discussed:

1. Chris Gilbreath stated that he felt that the RLCR is confusing in that it doesn't clearly identify what has been surveyed and what has not. Gary stated that he would add a Table to the document to clarify the survey results for these structures. In addition, Chris requested that a paragraph be added describing the rad sampling/PRE approach to Free Releasing these structures/free standing equipment/cargoes;
2. Chris Gilbreath agreed that the CO2 Systems for both B883/865 did not meet the DPP Type 1 definition of a facility but were in fact freestanding equipment. Gary pointed out that he had buyers interested in purchasing the entire system. Chris agreed that this equipment could be dispositioned in accordance with RFETS policy and procedures. However, Chris pointed out that this was his opinion and not an authorization. He would be taking his interpretation and opinion back to CDPHE management which would make the final decision;
3. Cargo Containers. Chris Gilbreath questioned our PRE policy and process for "Free Releasing" cargoes and requested copies of the PREs. Gary stated he could obtain copies from CSS. Chris Gilbreath requested smears be conducted on the outside of these cargoes to supplement the process knowledge PRE

that existed for these cargoes. Chris reasoned that the stakeholders would be concerned about the use of a Process Knowledge PRE vs smear sampling. Gary Konwinski pointed out that we were following the existing Free Release process. However, in order to expedite the approval to remove these structures/free standing equipment, RMRS would conduct smear sampling on the outside of whatever structures CDPHE approved for removal. (CO2 systems, B863, Extrusion Press, etc.). NOTE: Gary Konwinski researched the CSS process for removal and disposition of the Cargoes through CSS and found that smears will be taken as part of the standard protocol for disposition through PU&D.

4. B863 Sutton Extrusion Press switchgear, B863. Although this equipment and building would be processed through PU&D and sold as excess equipment, Chris Gilbreath pointed out that this structure was much closer to a Type 1 Building under the DPP than any of the other entities. As such he wasn't sure whether CDPHE would approve disposition of this building outside of RFCA. External smear samples of this building were requested to supplement the Process Knowledge PRE;
5. Maintenance Shed. Chris Gilbreath agreed that this shed did not meet the Type 1 definition of a facility. External smear samples of this building were requested to supplement the Process Knowledge PRE;
6. Chris Gilbreath expressed concern that the RFETS site-wide process for disposition of frees standing equipment/cargoes/non-Type 1 structures. Chris suggested that possibly the development of implementing procedures attached to Jeff Steven's Characterization Protocols might be the best place to include the PRE/Rad Sampling protocols for this type of material. Terry Vaughn was identified as a key player in the development of this document, should RFETS decide to proceed down this path.
7. Chris Gilbreath requested that CDPHE be involved sooner in the process of determining "structure/equipment/facility disposition. The State did not want to go into a building for the first time and find only bare walls without knowing how all the equipment had been dispositioned.

Distribution:

C. Gilbreath	CDPHE	D. Krushek	CDPHE
D. Grosek	RFFO	R. McPherson	RMRS
G. Konwinski	RMRS	R. Carlson	K-H
T. Hopkins	RMRS	T. Benton,	WSI
R. Leitner	K-H	K. North	K-H
F. Phillips	K-H	W. Wierzbicki	SSOC
K. Nell	CSS	J. Stevens	K-H
K. Myers	P.E.		



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